

FILED

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
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NOV - 7 2019
Clerk, U.S. Bankruptcy,
Orlando Division

In re

MASSOUD RAJABI,
Debtor.

Case No.: 6:18-bk-07976-CCJ
Chapter 13

**AMENDED MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN
OPPOSITION TO CREDITOR'S RESPONSE TO DEBTOR'S OBJECTION TO
CLAIM**

Debtor, MASSOUD RAJABI, *pro se*, respectfully requests leave of the Court to file a Reply Memorandum in Opposition to Creditor's Response to Debtor's Objection to Claim (Doc. 66), and in further support hereof, states as follows:

1. On or about February 5, 2019, Villas at Lakeside Condominium Association, Inc. (the "Association" or "Creditor") filed a purported proof of claim (Claim No. 3) (the "Claim") in this case, and included a copy of its purported lien dated July 29, 2013, (the "Lien"), as proof of its secured status and Claim.
2. On or about October 25, 2019, Debtor filed an objection to the Claim (the "Objection") with supporting documentation, clear facts and competent proofs demonstrating that the Lien is totally invalid, unlawful and unenforceable, because of a number of unfair and willful violations of law by the Association.
3. On or about November 1, 2019, the counsel for the Association filed a response to Debtor's Objection to Claim (the "Response").
4. The Association's Response lacks sufficient accuracy, good faith, truthfulness, legitimacy and/or any merit, and many of the statements provided therein are inaccurate

and unsupported, and/or most of the important legal issues, problems and requirements, are intentionally omitted or ignored.

5. Debtor in good faith believes that it is necessary to file a Reply Memorandum to identify to the Court the particularly significant inaccuracies and legal issues.

6. Pursuant to Federal Rules of Bankruptcy Procedure, Debtor requests an opportunity and permission to file a Reply Memorandum in opposition to the Association's Response. The proposed Reply will not exceed 20 pages in length.

WHEREFORE, the Debtor respectfully requests that this Honorable Court grant this Amended Motion For Leave to File a Reply Memorandum in Opposition to Creditor's Response to Debtor's Objection to Claim, and grant any other such relief as the Court determines appropriate, just and proper.

Respectfully submitted on November 7, 2019, by:



/s/ Massoud Rajabi

Massoud Rajabi, Debtor
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by Electronic Mail and U.S. First Class Mail, postage prepaid, on November 7, 2019, to the following:

Laurie K. Weatherford
Chapter 13 Trustee
P.O. Box 3450
Winter Park, FL 32790-3450
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Villas at Lakeside Condominium Association, Inc.
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